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March 14, 2022

BY ECF

The Honorable Philip M. Halpern
United States District Judge
Southern District of New York
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601

Re: *United States v. Caswell Senior, S6 20 Cr. 626 (PMH)*

Dear Judge Halpern:

I write with the consent of the Government and on behalf of defense counsel to request a five-day extension with which to file pretrial motions, currently due on Thursday, March 17, 2022. Over the past several weeks, issues have arisen with the Government's discovery production which we have endeavored to resolve (*see* S.D.N.Y. Local Rule 16.1).

On March 2, 2022, the Government produced an original drive containing over six million files which our discovery coordinator is still copying to her own drive and consulting with us as to the contents of the underlying files. We request the additional time to potentially resolve the discovery issues and determine whether the issues should be raised in our motions. Should these issues require briefing, we would respectfully request permission to file a Defendants' Joint Opening Brief of 30 pages instead of the 25 pages as ordered by the Court on November 16, 2021. *See* D.E. 272.

Although we do not believe that the requested extension would require a change to the remaining motion schedule, there would be no objection to an overall modification of the briefing schedule if the Government, upon reviewing our motions, would seek additional time to respond.

Thank you for your courtesy and consideration.

Respectfully submitted,

/s/

James Kousouros, Esq.

c.c. All Counsel (by ECF)